

THE HARMAN FIRM, LLP

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August 3, 2016

VIA ECF

The Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: *Paulino De La Cruz et al. v. Trejo Liquors Inc., et al.*
16-cv-4382 (VSB)

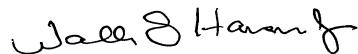
Dear Judge Broderick:

This firm represents Paulino De La Cruz and Juventino Ramos in the above-referenced matter. We write in response to Defendants' pre-motion letter dated July 28, 2016.

Defendants assert that Plaintiffs' Complaint is inadequate and request a pre-motion conference in advance of their anticipated motion to dismiss the complaint under Rule 12(b)(6) of the Federal Rules of Civil Procedure. Although we thoroughly disagree with Defendants' characterization of Plaintiffs' pleadings, should Defendants move to dismiss on the grounds outlined in their letter, Plaintiffs will amend their Complaint under Rule 15(a)(1)(B). Accordingly, the parties need not take the Court's time with pre-motion conferences and motions; instead, Plaintiffs respectfully request that Court allow Plaintiffs to submit its First Amended Complaint by August 18, 2016.

Thank you for your time and consideration.

Respectfully submitted,



Walker G. Harman, Jr.

cc: Argilio Rodriguez, Esq. (via ECF)